

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

GREYSTONE MORTGAGE, INC., and FIRST  
FINANCIAL LENDING LLC, *on behalf of  
themselves and all others similarly situated,*

Plaintiffs,

v.

EQUIFAX WORKFORCE SOLUTIONS LLC,  
and EQUIFAX, INC.,

Defendants.

Case No. 2:24-cv-02260-JFM

Hon. John F. Murphy

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULING**

WHEREAS, Defendants have moved to compel arbitration and stay proceedings (DI 114) and to stay discovery pending ruling on Defendants' motion to compel arbitration and stay proceedings (DI 115), and the Court has stayed discovery temporarily until further order (DI 117);

WHEREAS, the Court's March 25, 2025 Scheduling Order (DI 66) contains an upcoming September 1, 2025 deadline to amend pleadings, which is effectively September 2 because of the Labor Day holiday;

WHEREAS, the Parties seek to clarify that the Court's Order staying discovery applies to all deadlines in the Court's March 24, 2025 Scheduling Order;

WHEREAS, on July 25, 2025, Defendants filed a motion to compel arbitration and stay proceedings (DI 114) and associated papers;

WHEREAS, on August 1, 2025, the Parties submitted a joint letter stating that they believed the Court can resolve Defendants' motion to compel arbitration and stay proceedings without the need for further discovery, and stipulated to a briefing schedule (DI 119);

WHEREAS, on August 4, 2025, the Court so ordered the parties' joint stipulation (DI 120),

extending the date for Plaintiffs' opposition to Defendants' motion to compel to August 25, 2025 and Defendants' reply thereto to September 8, 2025;

WHEREAS, Plaintiffs filed on August 25, 2025 both a motion to enjoin enforcement of Defendants' arbitration clause and limit Defendants' communications with potential class members as to this litigation (DI 121) ("Plaintiffs' Motion") and their opposition to Defendants' motion to compel arbitration and stay proceedings (DI 122);

WHEREAS, because under the Local Rules and this Court's policies and procedures, Defendants' opposition to Plaintiffs' Motion is due on September 8, 2025, the same date as Defendants' reply brief in support of their motion to compel arbitration and stay proceedings as set by the Court's order on the Joint Stipulation to Extend Time (DI 120), a period that is effectively further shortened by the intervening Labor Day holiday, good cause exists for an extension;

WHEREAS, because under the Local Rules and this Court's policies and procedures, if the requested extension is granted as to Defendants' opposition to Plaintiffs' Motion, the deadline for Plaintiffs' reply in support of their Motion would fall on Rosh Hashanah, good cause exists for an extension;

WHEREAS, to the extent the Court's Order staying discovery does not apply to the September 1, 2025 deadline to amend pleadings (DI 66), or other deadlines therein that may not be considered discovery deadlines, good cause exists for a stay of those deadlines in light of Defendants' motion to compel arbitration and stay proceedings (DI 114) and the Court's Order staying discovery (DI 117).

NOW, THEREFORE, Plaintiffs Greystone Mortgage, Inc. and First Financial Lending LLC, and Defendants Equifax Workforce Solutions LLC and Equifax, Inc., by and through their

undersigned counsel, hereby stipulate and agree that all remaining deadlines in the Court's March 25, 2025 Scheduling Order should be stayed and that the remaining dates for briefing both parties' motions should be as follows:

<b>Defendants' Opposition to Plaintiffs' Motion to Enjoin Enforcement of Defendants' Arbitration Clause and Limit Defendants' Communications With Class Members as to This Litigation</b>	Wednesday, September 17, 2025
<b>Defendants' Reply in Support of Defendants' Motion to Compel Arbitration and Stay Proceedings</b>	Wednesday, September 17, 2025
<b>Plaintiffs' Reply in Support of Plaintiffs' Motion to Enjoin Enforcement of Defendants' Arbitration Clause and Limit Defendants' Communications With Class Members as to This Litigation</b>	Monday, September 29, 2025

By seeking this relief, no party has waived any rights or arguments related to either of the above motions.

The Parties respectfully request that the Court "so order" this stipulation, confirming above schedule and that all operative deadlines in the Court's March 24, 2025 Scheduling Order are stayed, consistent with the Court's Order staying discovery temporarily until further order (DI 117).

Dated: August 26, 2025

/s/ Katie R. Beran

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*Counsel for Plaintiffs and the Proposed Class*

SO ORDERED.

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Hon. John F. Murphy  
United States District Judge